



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

MAA/LB/CJN  
F. #2017R05903

*271 Cadman Plaza East  
Brooklyn, New York 11201*

December 13, 2023

By Email and ECF

Thomas C. Green  
Mark D. Hopson  
Michael A. Levy  
Brian J. Stretch  
Douglas A. Axel  
Melissa Colon-Bosolet  
Sidley Austin LLP

David Bitkower  
Matthew S. Hellman  
Matthew D. Cipolla  
Jenner & Block LLP

Re: United States v. Huawei Technologies Co., Ltd., et al.  
Criminal Docket No. 18-457 (S-3) (AMD)

Dear Counsel:

Enclosed please find the government's production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019 ("the Protective Order"). See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendants.

I. The Government's Discovery

The enclosed discovery contains documents produced to the government by the entities identified as Company 2 and Company 4 in the Third Superseding Indictment and Bates stamped DOJ\_HUAWEI\_A\_0117091724 through DOJ\_HUAWEI\_A\_0117092721. The document designations pursuant to the Protective Order are set forth in the following chart.

<b>Document Description</b>	<b>Category of Discovery Pursuant to Protective Order</b>	<b>Bates Range</b>
Company 2 records.	Sensitive Discovery Material ("SDM")	DOJ_HUAWEI_A_0117091724 – DOJ_HUAWEI_A_0117091738
Company 4 records.	SDM	DOJ_HUAWEI_A_0117091739 – DOJ_HUAWEI_A_0117091935
Company 2 records.	Discovery Material ("DM")	DOJ_HUAWEI_A_0117091936 – DOJ_HUAWEI_A_0117091968
Company 4 records.	DM	DOJ_HUAWEI_A_0117091969 – DOJ_HUAWEI_A_0117092721

Very truly yours,

BREON PEACE  
United States Attorney  
Eastern District of New York

By: /s/ Meredith A. Arfa  
Alexander A. Solomon  
Meredith A. Arfa  
Robert Pollack  
Assistant United States Attorneys  
(718) 254-7000

MARGARET A. MOESER  
Acting Chief, Money Laundering and Asset  
Recovery Section, Criminal Division  
U.S. Department of Justice

By: /s/ Laura Billings  
Laura Billings  
Trial Attorney

JENNIFER KENNEDY GELLIE  
Acting Chief, Counterintelligence and  
Export Control Section  
National Security Division, U.S. Department  
of Justice

By: /s/ David Lim  
David Lim  
Christian Nauvel  
Yifei Zheng  
Garrett Coyle  
Trial Attorneys